

Koch, Kristine

From: Koch, Kristine
Sent: Thursday, June 25, 2015 7:17 AM
To: Khajetoorians, Asteghik; Bob Wyatt (rjw@nwnatural.com)
Cc: Sheldrake, Sean; Cora, Lori; Kim, Grace S.
Subject: RE: Requested Corrections to Statements in the EPA Draft Final Section 1 of the Feasibility Study (Lower Willamette River, Portland Harbor Superfund Site; Docket No. CERCLA-10-2001-0240)

Asik – I think your request is a good one, but the introduction to this section already states that, so it doesn't bear repeating. Here is the language that is in the introduction.

Figure 1.2-20a through Figure 1.2-20h and **Figure 1.2-21** (inset of the Doane Lake area) show the nature and extent of known contaminated groundwater plumes currently or potentially discharging to the river. Cleanup of contaminated groundwater is being managed by DEQ under an MOU with EPA (see 1.2.2.2, above). However, in-water actions may need to be considered under this response to address residual impacts from these groundwater plumes. The following provides a discussion of the groundwater plumes presented in **Figures 1.2-20a through 1.2-20h** and **1.2-21**. Additional information on these sites is available in DEQ's ECSI database.

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-122
Seattle, Washington 98101-3140

(206)553-6705
(206)553-8581 (fax)
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

From: Khajetoorians, Asteghik [mailto:Asteghik.Khajetoorians@millernash.com]
Sent: Wednesday, June 24, 2015 9:01 PM
To: Koch, Kristine; Bob Wyatt (rjw@nwnatural.com)
Cc: Sheldrake, Sean; Cora, Lori; Kim, Grace S.
Subject: RE: Requested Corrections to Statements in the EPA Draft Final Section 1 of the Feasibility Study (Lower Willamette River, Portland Harbor Superfund Site; Docket No. CERCLA-10-2001-0240)

Dear Kristine:

Thank you for your June 10th email, which responded to our June 5th letter requesting modifications to Section 1.2.3.4 of EPA's Draft FS. EPA agreed to make certain modifications to language describing conditions at BP's Terminal 22T, but did not agree to add proposed language which would have described source control measures implemented at the Terminal, explaining that source control measures are described in Section 1.2.2.2 of the Draft FS. Consequently, EPA's language in Section 1.2.3.4 is ambiguous as the language could be understood to describe current conditions at the Terminal, which would be inaccurate. We, therefore, request that EPA in Section 1.2.3.4 refer to Section 1.2.2.2 for source control measures and current conditions at the Terminal. We request that you make the following additional revision to Section 1.2.3.4:

RM 5

BP Arco Bulk Terminal (ECSI Site ID 1528) – A TPH plume (both dissolved and LNPL) has discharged to the river. Contaminants include TPH (gasoline-range and diesel-range hydrocarbons), and the plume extends under the adjacent downstream property. **Refer to Section 1.2.2.2 for source control measure implemented at the Terminal.**

This reference would direct the reader to DEQ's Source Control Summary Report, which would provide a summary of the source control measures implemented at BP's Terminal and help resolve any confusion created by the current language of the Draft FS. We appreciate your consideration of our additional suggestion to revise the Draft FS. Please do not hesitate to call, if you have any questions.

Kindest regards,
Asik

Mobile: 949.637.1041

E-mail: asik.khajetoorians@millernash.com

Asteghik Khajetoorians

Partner

Miller Nash Graham & Dunn LLP

100 OceanGate | Suite 300 | Long Beach, California 90802

Direct: 562.247.7621 | Office: 562.435.8002 | Fax: 562.435.7967

E-Mail | Bio | Social | Blogs

Please consider the environment before printing this e-mail.

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]

Sent: Wednesday, June 10, 2015 1:33 PM

To: Khajetoorians, Asteghik; Bob Wyatt (rjw@nwnatural.com)

Cc: Sheldrake, Sean; Cora, Lori; Kim, Grace S.

Subject: RE: Requested Corrections to Statements in the EPA Draft Final Section 1 of the Feasibility Study (Lower Willamette River, Portland Harbor Superfund Site; Docket No. CERCLA-10-2001-0240)

Asik, I have reviewed the changes you have requested and agree that LNAPL is not a contaminant, but a phase. The language on p.1-15 has been changed as follows:

RM 5

BP Arco Bulk Terminal (ECSI Site ID 1528) – A TPH plume (**both dissolved and LNAPL**) has discharged to the river. Contaminants include TPH (gasoline-range and diesel-range hydrocarbons) ~~and LNAPL~~, and the plume extends under the adjacent downstream property.

In response to your request to include source control information in this section, I disagree since this section is discussing nature and extent of contamination. Source control is discussed in Section 1.2.2.2 on p.1-6, which refers the reader to the DEQ Source Control Summary Report.

In response to your request to change the designation of groundwater plumes that are currently or potentially discharging to the river to groundwater plumes in the vicinity of the Portland Harbor Superfund Site, I disagree since all sources, including potential sources, are part of the Portland Harbor Superfund Site.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency

Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-122
Seattle, Washington 98101-3140

(206)553-6705
(206)553-8581 (fax)
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

From: Khajetoorians, Asteghik [<mailto:Asteghik.Khajetoorians@millernash.com>]

Sent: Tuesday, June 09, 2015 2:21 PM

To: Koch, Kristine; rgw@nwnatural.com

Cc: Sheldrake, Sean; Cora, Lori; Kim, Grace S.

Subject: RE: Requested Corrections to Statements in the EPA Draft Final Section 1 of the Feasibility Study (Lower Willamette River, Portland Harbor Superfund Site; Docket No. CERCLA-10-2001-0240)

Ms. Koch,

Thank you very much. We greatly appreciate EPA's consideration of Atlantic Richfield Company's comments in finalizing Section 1 of the FS.

Kindest regards,
Asik

Mobile: 949.637.1041

E-mail: asik.khajetoorians@millernash.com

Asteghik Khajetoorians

Partner

Miller Nash Graham & Dunn LLP

100 OceanGate | Suite 300 | Long Beach, California 90802

Direct: 562.247.7621 | Office: 562.435.8002 | Fax: 562.435.7967

E-Mail | Bio | Social | Blogs

Please consider the environment before printing this e-mail.

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]

Sent: Friday, June 05, 2015 4:37 PM

To: Khajetoorians, Asteghik; rgw@nwnatural.com

Cc: Sheldrake, Sean; Cora, Lori

Subject: RE: Requested Corrections to Statements in the EPA Draft Final Section 1 of the Feasibility Study (Lower Willamette River, Portland Harbor Superfund Site; Docket No. CERCLA-10-2001-0240)

Thank you. We have not released the document for public comment, but we will consider these in finalizing the document.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-122
Seattle, Washington 98101-3140

(206)553-6705
(206)553-8581 (fax)
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

From: Khajetoorians, Asteghik [<mailto:Asteghik.Khajetoorians@millernash.com>]

Sent: Friday, June 05, 2015 4:29 PM

To: Koch, Kristine; rgw@nwnatural.com

Cc: Cohen, Lori; Muza, Richard; Sheldrake, Sean

Subject: Requested Corrections to Statements in the EPA Draft Final Section 1 of the Feasibility Study (Lower Willamette River, Portland Harbor Superfund Site; Docket No. CERCLA-10-2001-0240)

All,

Please find attached letter with regard to the above subject matter.

Thank you,

Asik

Mobile: 949.637.1041

E-mail: asik.khajetoorians@millernash.com

Asteghik Khajetoorians

Partner

Miller Nash Graham & Dunn LLP

100 Oceangate | Suite 300 | Long Beach, California 90802

Direct: 562.247.7621 | Office: 562.435.8002 | Fax: 562.435.7967

E-Mail | Bio | Social | Blogs

Please consider the environment before printing this e-mail.

CONFIDENTIALITY NOTICE: This e-mail message may contain confidential or privileged information. If you have received this message by mistake, please do not review, disclose, copy, or distribute the e-mail. Instead, please notify us immediately by replying to this message or telephoning us. Thank you.
